Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Parts 2 and 25 of the	)	
Commission's Rules to Facilitate the Use of	)	IB Docket No. 17-95
Earth Stations in Motion Communicating	)	
with Geostationary Orbit Space Stations in	)	
Frequency Bands Allocated to the Fixed	)	
Satellite Service	)	

COMMENTS OF PANASONIC AVIONICS CORPORATION

Panasonic Avionics Corporation ("Panasonic") respectfully submits these comments on the Further Notice of Proposed Rulemaking ("FNPRM") accompanying the Commission's Report and Order in the above-captioned proceeding.[1]

Panasonic is the world's leading provider of in-flight entertainment and communications systems and holds a blanket license to operate various Ku-band aeronautical earth stations in motion ("ESIMs," otherwise known as earth stations aboard aircraft or "ESAAs").[2] Panasonic's global "eXConnect" system uses Ku-band geostationary satellite orbit ("GSO") fixed-satellite service ("FSS") satellites to support Internet access, real-time video content, and other services to passengers and crew onboard aircraft around the world. Thus, Panasonic has a significant interest in the Commission's new ESIM regulations.

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[1] *In the Matter of Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed Satellite Service*, IB Docket No. 17-95, Report and Order and Further Notice of Proposed Rulemaking, FCC 18-138 (rel. Sept. 27, 2018) ("FNPRM").

[2] *Panasonic Avionics Corporation*, Radio Station Authorization, File No. SES-MFS-20180122-00052, Call Sign E100089 (granted Aug. 1, 2018) ("Panasonic Blanket License").

Panasonic welcomes the Ku-band spectrum access proposal set forth in the FNPRM that would permit ESIM receive operations on an unprotected basis in the 10.7-10.95 GHz and 11.2-11.45 GHz bands.[3] Access to additional ESIM receive spectrum would enhance flexibility, data rates, and aggregate capacity for ESIM operators and consumers.[4]

Because ESIMs would only receive in the 10.7-10.95 GHz and 11.2-11.45 GHz downlink bands, allowing ESIMs to operate in these bands would not increase the potential for harmful interference to other spectrum users. Furthermore, because ESIMs operate on mobile platforms (*i.e.*, in aeronautical, maritime and land-mobility applications) and often far from other co-frequency systems and services (*e.g.*, aircraft in flight, vessels in international waters, *etc*.), there is no need to protect ESIM receive operations in these bands. Indeed, the Commission has already authorized Panasonic to operate its terminals in the 10.7-10.95 GHz and 11.2-11.45 GHz bands on an unprotected basis both within and outside the United States,[5] and no interference issues have been associated with these operations. Thus, the Commission can confidently move to regularize access to the 10.7-10.95 GHz and 11.2-11.45 GHz bands.

Expanding the Ku-band downlink spectrum available for ESIM receive operations with GSO FSS satellites to include the 10.7-10.95 GHz and 11.2-11.45 GHz bands will provide additional flexibility and capacity to the growing ESIM market. Such access can be granted on an unprotected basis without any adverse effects on other users of the spectrum. Thus, adoption

[3] *See* FNPRM at ¶¶ 90-91.

[4] Panasonic takes no position with respect to the other frequency bands included in the FNPRM.

[5] *See* Panasonic Blanket License at Condition 90458.

of the Commission's proposal is in the public interest, and Panasonic strongly supports opening the 10.7-10.95 GHz and 11.2-11.45 GHz bands to unprotected ESIM receive operations.

Respectfully submitted,

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